

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

<b>OPTIS WIRELESS TECHNOLOGY, LLC and PANOPTIS PATENT MANAGEMENT, LLC,</b>  <p style="text-align: center;"><b>Plaintiffs,</b></p> <p style="text-align: center;"><b>v.</b></p>	§ § § § § § § § § §	
<b>BLACKBERRY LIMITED, et al,</b>	§ § § §	<b>2:16-cv-0062-JRG-RSP LEAD CASE</b>
<b>KYOCERA COMMUNICATIONS, INC., et al,</b>	§ § § §	<b>2:16-cv-0061-JRG-RSP</b>
<b>Defendants.</b>	§ § §	<b>JURY TRIAL REQUESTED</b>

**JOINT MOTION FOR ENTRY OF DISCOVERY ORDER**

Pursuant to the Court’s March 23, 2016 Order regarding a scheduling conference (Dkt. No. 20), Plaintiffs Optis Wireless Technology, LLC and PanOptis Patent Management, LLC (collectively, “Plaintiffs”) and Defendants BlackBerry Limited, BlackBerry Corporation, Kyocera Communications, Inc., and Kyocera Corporation, jointly submit a proposed Discovery Order, attached hereto as Exhibit A.

Dated: May 13, 2016.

Respectfully submitted,

/s/David T. DeZern

J. Cary Gray (Lead Counsel for PPM)  
Texas Bar No. 08322300  
cgray@grayreed.com  
James Ormiston  
Texas Bar. No. 15307500  
jormiston@grayreed.com  
Michael Ellis  
Texas Bar No. 24081586  
mellis@grayreed.com  
**GRAY REED & MCGRAW, P.C.**  
1300 Post Oak Blvd., Suite 2000  
Houston, TX 77056  
Telephone: (713) 986-7000  
Facsimile: (713) 986-7100

Eric S. Tautfest  
Texas Bar No. 24028534  
etautfest@grayreed.com  
Jared Hoggan  
Texas Bar No. 24065435  
jhoggan@grayreed.com  
David T. DeZern  
Texas Bar. No. 24059677  
ddezern@grayreed.com  
M. Jill Bindler  
Texas Bar No. 02319600  
jbindler@grayreed.com  
**GRAY REED & MCGRAW, P.C.**  
1601 Elm Street, Suite 4600  
Dallas, Texas 75201  
Telephone: (214) 954-4135  
Facsimile: (469) 320-6901

Eric M. Albritton (Lead Counsel for Optis  
Wireless)  
Texas Bar No. 00790215  
ema@emafirm.com  
Shawn A. Latchford  
Texas State Bar No. 24066603  
sal@emafirm.com  
**Albritton Law Firm**  
PO Box 2649

/s/Marc S. Blackman (with permission by David  
T. DeZern)

David L. Witcoff  
Lead Attorney  
Illinois State Bar No. 06183629  
dlwitcoff@jonesday.com  
Marc S. Blackman  
Illinois State Bar No. 06236719  
msblackman@jonesday.com  
Thomas W. Ritchie  
Illinois State Bar No. 06301954  
twritchie@jonesday.com  
JONES DAY  
77 West Wacker  
Chicago, Illinois 60601-1692  
Telephone: (312) 782-3939  
Facsimile: (312) 782-8585

Jeffrey M. White  
Texas State Bar No. 24064380  
jwhite@jonesday.com  
JONES DAY  
2727 North Harwood Street  
Dallas, Texas 75201  
Telephone: (214) 220-3939  
Facsimile: (214) 969-5100

Attorneys for Defendants Kyocera Corporation  
and Kyocera Communications, Inc.

Longview, TX 75606  
Telephone: (903) 757-8449  
Facsimile: (903) 758-7397

**ATTORNEYS FOR PLAINTIFFS**  
**PanOptis Patent Management, LLC**  
**and Optis Wireless Technology, LLC**

/s/ Eric Huang (with permission by David T. DeZern)

E. Leon Carter  
Texas State Bar No. 03914300  
lcarter@carterscholer.com  
John S. Torkelson  
Texas State Bar No. 00795154  
jtorkelson@carterscholer.com  
CARTER SCHOLER ARNETT HAMADA &  
MOCKLER PLLC  
8150 N. Central Expressway  
Suite 500  
Dallas, TX 75206  
Tel: 214-550-8188  
Fax: 214-550-8185

James R. Asperger (*pro hac vice*)  
jimasperger@quinnemanuel.com  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
865 S. Figueroa Street, 10th Floor  
Los Angeles, California 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100

Kevin P.B. Johnson (*pro hac vice*)  
kevinjohnson@quinnemanuel.com  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, CA 94065  
Telephone: 650-801-5000  
Facsimile: 650-801-5100

Eric Hui-chieh Huang (*pro hac vice*)  
erichuang@quinnemanuel.com  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
51 Madison Avenue, 22nd Floor

New York, NY 10010

Telephone: 212-849-7000

Facsimile: 212-849-7100

**ATTORNEYS FOR DEFENDANTS**

**BLACKBERRY LIMITED &**

**BLACKBERRY CORP.**

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on this the 13<sup>th</sup> day of May, 2016. Local Rule CV- 5(a)(3)(A).

/s/David T. DeZern